

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION - DAYTON**

KOSAL TITH,)	CASE NO. 3:13-CV-284
)	
Plaintiff,)	JUDGE RICE
)	
vs.)	
)	
THYSSENKRUPP MATERIALS NA,)	<u>UNOPPOSED MOTION FOR</u>
INC.,)	<u>EXTENSION OF TIME FOR</u>
)	<u>LEAVE TO PLEAD</u>
)	
Defendant.)	
)	
)	

Pursuant to Local Rule 6.1, Defendant Thyssenkrupp Materials, NA, Inc. (“Defendant”) respectfully moves this Court for an extension of time of 21 days, or until November 12, 2013 in which to move, plead, or otherwise respond to the Complaint of Plaintiff Kosal Tith (“Plaintiff”). The original answer date is presently October 22, 2013. Defendant has not sought or received any prior extensions of time and the total requested extension does not exceed 21 days. Undersigned counsel has communicated with Plaintiff’s counsel, who does not oppose the requested extension. Defendant submits the requested extension is not for purposes of delay, but for the purpose of allowing Defendant additional time to investigate and respond to Plaintiff’s purported class action complaint. Moreover, Plaintiff has consented to and will not be prejudiced by the requested extension.

Accordingly, Defendant respectfully requests an order of the Court granting an extension of time until November 12, 2013 in which to move, plead or otherwise respond to the Plaintiff’s Complaint.

Respectfully submitted,

/s/ Douglas B. Schnee

William J. O'Neill (0029936)

Douglas B. Schnee (0063643)

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on October 17, 2013, the foregoing Motion for Extension of Time to Move or Plead was electronically filed using the Court's CM/ECF system, which will send notification of filing to all counsel of record.

/s/ Douglas B. Schnee
DOUGLAS B. SCHNEE (0063643)

Counsel for Defendant